

Exhibit 16

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

ESCAPEX IP, LLC,)	
Plaintiff,)	
)	Civil Action No. 6:22-cv-00427-ADA
v.)	
)	
APPLE, INC.,)	JURY TRIAL DEMANDED
Defendant.)	

PLAINTIFF’S UNOPPOSED MOTION FOR DISMISSAL WITH PREJUDICE

Under Federal Rule of Civil Procedure 41(a)(1)(A)(i), Plaintiff, Escapex IP, LLC moves to dismiss all of Plaintiff’s claims against Defendant Apple Inc. in the above-captioned case WITH PREJUDICE. For the avoidance of doubt, this motion does not preclude Apple Inc. from pursuing any future claims or defenses relating to U.S. Patent No. 9,009,113.

Dated: October 25, 2022

Respectfully submitted,

Ramey LLP



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that October 25, 2022, the foregoing document was served on all counsel of record who have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/William P. Ramey, III
William P. Ramey, III